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Attorney for Defendant

JOAQUIN CHAVEZ-NAVARRO

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOAQUIN CHAVEZ-NAVARRO,

Defendant.

Case No.: 14-cr-489-CRB

**STIPULATION AND ORDER
TO CONTINUE STATUS HEARING TO
JANUARY 13, 2016**

Date: November 18, 2015

Time: 4:00 pm

Court: Hon. Charles R. Breyer

IT IS HEREBY STIPULATED by the parties that the presently scheduled status conference hearing for November 18th, 2015 at 4:00 p.m. be continued to January 13th, 2016 at 2:00 p.m.

The Government has provided discovery to defense counsel and counsel is requesting time to review the discovery and discuss options with Mr. Chavez-Navarro. Furthermore, Mr. Chavez-Navarro has medical conditions, brain cancer, skull cancer, and face cancer, that have slowed the process of reviewing the discovery and discussing his options. Counsel has kept the Government informed of Mr. Chavez-Navarro's medical conditions and counsel has been working with Mr. Chavez-Navarro to get him medical insurance and set up medical appointments to treat the cancer.

Both parties are requesting that time be excluded under the Speedy Trial Act pursuant to 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(I), and ((h)(7)(B)(iv) for necessary effective preparation of defense counsel taking into account the exercise of due diligence and for continuity of counsel.

Date: November 16, 2015

_____/S/
CHARLES J.S. WOODSON
Attorney for Defendant
JOAQUIN CHAVEZ-NAVARRO

Dated: November 16, 2015

_____/S/
MATTHEW L. McCARTHY
Assistant United States Attorney

IT IS SO ORDERED.

Dated: November 17, 2015



Hon. CHARLES R. BREYER
United States District Judge